

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

RAY AHMED FAYAD,

Plaintiff,

Case No.: 18-cv-13982

Hon. Terrence G. Berg

v.

JAMES MCMAHON, City of Highland Park Officer; KELLY DUPUIS, City of Highland Park Officer; CHESTER LOGAN, City of Highland Park Chief of Police; MICHAEL STOUT, City of Hamtramck Officer; City of Hamtramck Officer; ANNE MOISE, City of Hamtramck Chief of Police; YOUSEF DABAJA, all in their individual and official capacities; CITY OF HAMTRAMCK, a municipal corporation; and CITY OF HIGHLAND PARK, a municipal corp.; all jointly and severally,

Defendants.

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**OFFER OF JUDGMENT**

Defendants, City of Hamtramck, Anne Moise and Michael Stout (“Hamtramck Defendants”), by their attorneys, ALLEN BROTHERS, ATTORNEYS & COUNSELORS, P.L.L.C., and Defendant City of Highland Park, Chester Logan, James McMahon and Yousef Dabaja (“Highland Park Defendants”) (hereinafter collectively known as “Defendants”), by their attorneys, GIARMACO, MULLINS & HORTON, P.C., collectively make an Offer to Stipulate to Entry of Judgment to Plaintiff Ray Fayad pursuant to FEDRCivP 68 in the total aggregate amount of Five Hundred Thousand & 00/100 Dollars (\$500,000), inclusive of

attorney fees and costs. This shall be the total amount to be paid by Defendants for all liability claimed in this action, including all costs of suit and attorney fees otherwise recoverable in this action by Plaintiff. The Plaintiff will also be required to execute a mutually agreed upon General Release and Waiver of All Claims.

If Plaintiff does not jointly accept this Offer, he may be obligated to pay Defendants' costs and attorney fees incurred after the making of this Offer in the event Plaintiff does not recover a judgment that is more favorable than this Offer of Judgment, pursuant to Rule 68(d) of the FEDRCivP. Where Plaintiff sues under a statute that provides for attorney fees for a prevailing Plaintiff, the relevant costs payable hereunder include attorney fees.

To accept this offer, Plaintiff must serve written notice of acceptance within 14 days of the date this Offer is made.

This offer is not to be construed in any way as an admission of liability by Defendants, but rather, is made solely for the purpose of compromising a disputed claim.

Dated: January 18, 2022

/s/ Lindsey R. Johnson  
Lindsey R. Johnson (P67081)  
Attorney for Hamtramck Defs

/s/ Anthony Chubb  
Anthony Chubb (P72608)  
Attorney for Highland Park Defs

**CERTIFICATE OF SERVICE**

I hereby certify that on January 18, 2022, I electronically filed ***Defendants' Offer of Judgement*** and this ***Certificate of Service*** with the Clerk of the Court using the ECF system which will send notification of such filing and send copy of same to the attorneys of record.

/s/ Samantha A. Wells

Samantha A. Wells